

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

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THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long  
Form Complaint and

**Ronald Morris, Plaintiff,**

) No. 12-md-2323 (AB)

) MDL No. 2323

**NOTICE OF  
ATTORNEY'S LIEN**

Attorney John W. Lorentz, and The Lorentz Law Firm, P.A., attorney(s) in the above-entitled action, hereby notify this Court and all parties that they have a lien in this case for reasonable contingent attorney's fees plus reimbursement for legitimate case costs and expenses as set forth in the accompanying Petition to Establish Attorney's Lien relating to Plaintiff, **Ronald Morris**.

Dated: February 20, 2023

Respectfully Submitted,

THE LORENTZ LAW FIRM, P.A.

/s/ John W. Lorentz

John W. Lorentz – 0273764

13110 Henna Ave., N.

Saint Paul, MN 55110

Phone: (651) 483-4400

Fax: (651) 204-0065

[John@LorentzLaw.com](mailto:John@LorentzLaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing *Notice of Attorney's Lien* to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: February 20, 2023

/s/ John W. Lorentz  
John W. Lorentz – 0273764  
13110 Henna Ave., N.  
Saint Paul, MN 55110  
Phone: (651) 483-4400  
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Plaintiffs' Master Administrative Long  
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**Ronald Morris, Plaintiff**

**PETITION TO  
ESTABLISH  
ATTORNEY'S LIEN**

Now comes the Petitioner, John W. Lorentz, Esq., for The Lorentz Law Firm, P.A., ("**Lorentz**") pursuant to a fully executed and binding retainer agreement state:

Petitioner is an attorney at law admitted to practice before the Courts within the State of Minnesota, and files this Petition to establish a lien for attorney's fees as set forth herein.

1. On or about 5/30/2019, Petitioner was retained and employed by the Plaintiff, Ronald Morris, pursuant to a contingent fee agreement, to pursue a claim for injuries and damages caused by the National Football League's and all other responsible parties' liability for former and/or retired NFL players' long-term brain

injuries and other head injuries and damages associated with football-related concussions, head and brain injuries i.e., The *In re: National Football League Players' Concussion Injury Litigation* class action settlement.

A. The specifics of the contingent fee agreement are as follows:

- [T]o represent me in the settlement or trial of a lawsuit generally referred to as the 'NFL Concussion Litigation'.
- I agree to pay Attorney's the following as compensation for its services for any sum recovered from settlement or judgment prior to setoffs, surcharges, and liens: Fifteen Percent (15%)
- I agree to reimburse attorneys in the amount of the actual expenses incurred after the fee above is deducted from the gross amount of money recovered.
- Upon termination Attorneys may assert a lien on my recovery for the value of their time and expenses for which I do not object.

2. From the date the Petitioner was authorized to proceed on behalf of the Plaintiff, the Petitioner actively and diligently applied himself to the investigation, preparation, and pursuit of Plaintiffs' claims, and took all steps necessary to prosecute those claims, including, but not limited to, correspondence and communications with the client, review of medical records and other documents related to Plaintiff's case, contacting health care professionals for a

Neurology and Neuropsychological examination with travel arrangements and paying for same, preparation and registration into the NFL concussion settlement.

3. The Plaintiff discharged the Petitioner as his attorney in this matter, and it is expected that a new attorney will shortly be entering an appearance for the Plaintiff in this action.

4. The Petitioner was not terminated by the Plaintiff for cause and the termination was not due to any malfeasance or other improper action on the part of the Petitioner.

5. The Petitioner claims the right to have a lien for attorney's expenses established.

WHEREFORE, the Petitioner prays:

1. That his attorney's lien be determined;
2. That the amount of the lien be established;
3. That the Court order that the Petitioner be entitled to enforce his attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiff any sums of money until said lien has been

satisfied; and

5. For such other further relief as this Court deems just.

Dated: February 20, 2023

Respectfully Submitted,

The Lorentz Law Firm, PA

/s/ John W. Lorentz

John W. Lorentz – 0273764

13110 Henna Ave., N

Saint Paul, MN 55110

Office: (651) 483-4400

Fax: (651) 204-0065

**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing *Petition to Establish Attorney's Fees* to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: February 20, 2023

/s/ John W. Lorentz  
John W. Lorentz, Esq. (0273764)  
13110 Henna Ave. N  
Saint Paul, MN 55110  
Phone: (651) 483-4400  
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